

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

CONOPCO, INC. d/b/a UNILEVER

Plaintiff,

v.

INTERNATIONAL IP HOLDINGS, LLC,

Defendant.

Case No. 13-cv-1838

DECLARATION OF SCOTT HENDERSON

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I, Scott Henderson, being over the age of 18 years, competent to testify as to the matters stated herein, based on my own personal knowledge, state as follows:

1. I am the president of International IP Holdings, LLC ("IIH") and the person most knowledgeable as to the business operations relating to SLIMFUL and am based in Farmington Hills, MI.

2. IIH is the owner of intellectual property associated with the product that is marketed and sold under the brand name SLIMFUL.

3. IIH is a Michigan limited liability company, having its principal business location at 26600 Haggerty Road, Farmington Hills, Michigan 48331.

4. All advertising, marketing, packaging and artwork related to the SLIMFUL product was developed in Farmington Hills, MI.

5. Carl Sperber, the team leader for advertising design, packaging design and artwork related to the SLIMFUL product, is based in Farmington Hills, MI.

6. Mr. Sperber is the individual most knowledgeable about advertising design, packaging design and artwork related to the SLIMFUL product and would be the individual selected to testify on behalf of IIH on these issues in any litigation.

7. Mr. Sperber provides IIH the above-listed services through a shared service agreement.

8. Two people assist Mr. Sperber with the artwork related to the Slimful product, and both are based in Farmington Hills, MI and provide IIH the above-listed services through a shared service agreement.

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9. Two other people assist Mr. Sperber with social media marketing and are based in Farmington Hills, MI and provide IHH the above-listed services through a shared service agreement.

10. Lynn Petersmarck, the head of advertising purchasing for the SLIMFUL product, is based in Farmington Hills, MI.

11. Ms. Petersmarck is the individual most knowledgeable about advertising purchasing related to the SLIMFUL product and would be the individual selected to testify on behalf of IHH on this issue in any litigation.

12. Ms. Petersmarck provides IHH the above-listed services through a shared service agreement.

13. Three people assist Ms. Petersmarck with advertising purchasing and are based in Farmington Hills, MI.

14. Risé Meguiar, head of sales related to the SLIMFUL product, is based in Grand Rapids, MI.

15. Ms. Meguiar is the individual most knowledgeable about sales related to the SLIMFUL product and would be the individual selected to testify on behalf of IHH on this issue in any litigation.

16. Ms. Meguiar provides IHH the above-listed services through a shared service agreement.

17. The sales support team for the SLIMFUL product, which reports to Ms. Meguiar, is based in Farmington Hills, MI and provide IHH the above-listed services through a shared service agreement.

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18. Matt Dolmage is the individual most knowledgeable about accounting issues related to the SLIMFUL product and would be the individual selected to testify on behalf of IIH on this issue in any litigation.

19. Mr. Dolmage provides IIH the above-listed services through a shared service agreement.


20. Accounting matters, which Mr. Dolmage oversees, are handled by fifteen people, in addition to Mr. Dolmage, all of whom are based in Farmington Hills, MI and provide IIH the above-listed services through a shared service agreement.

21. Substantially all of the personnel, records and tangible items relating to the development, advertising design, packaging design, artwork, advertising purchasing, sales, and accounting related to the SLIMFUL product are located in Farmington Hills, MI.

22. To my knowledge, none of the personnel, records, and tangible items relating to the development, advertising design, packaging design, artwork, advertising purchasing, sales, and accounting related to the SLIMFUL product are located in New York.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Date: March 21, 2013



Scott Henderson

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